

Mr. John Strong
Stalcop L.P.
1217 West Main Street
Thorntown, IN. 46071

Re: Registered Construction and Operation Status,
011-12192-00047

Dear Mr. Strong:

The application from Stalcop L.P., received on April 19, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1 it has been determined that the following steel, aluminum and copper cold forming operation, to be located at 1217 West Main Street, Thorntown, Indiana, is classified as registered:

- (a) Thirteen (13) natural gas-fired heaters, with a maximum heat input capacity of 0.120 mmBtu/hr each and exhaust to the atmosphere.
- (b) One (1) natural gas-fired heater, with a maximum heat input capacity of 0.300 mmBtu/hr and exhausts to the atmosphere.
- (c) One (1) natural gas-fired heater, with a maximum heat input capacity of 0.414 mmBtu/hr and exhausts to the atmosphere.
- (d) One (1) open top vapor degreaser, with a maximum solvent usage rate of 4.15 pounds per hour and exhausts to the atmosphere.
- (e) One (1) heat treating process consisting of two (2) electric brazing furnaces and one (1) annealing furnace.
- (f) One (1) cleaning area consisting of the following:
 - 1. One (1) aqueous acid copper cleaning line designated as the "Bright Dip Line", consisting of several dip tanks containing various acid cleaners and rinses;
 - 2. One (1) degreasing line designated as the "De-Scale Line", consisting of several dip tanks containing various acid cleaners and rinses to prevent rust; and
 - 3. One (1) vibratory burnisher designated as the "Dishwasher" which is used to brighten and clean both copper and steel parts.
- (g) One (1) fabrication area consisting of the following:
 - 1. Pressing;
 - 2. Machining;
 - 3. Threading;
 - 4. Grinding;
 - 5. Sanding; and
 - 6. Metal Cutting.

The following conditions shall be applicable:

1. Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
2. Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. Therefore, the threading, pressing, machining, sanding, metal cutting and welding operations shall not exceed 0.551 pounds per hour per unit, based on a maximum process weight of less than 100 pounds per hour per unit.
3. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the owner or operator of a cold cleaning facility shall:
 - (a) equip the cleaner with a cover;
 - (b) equip the cleaner with a facility for draining cleaned parts;
 - (c) close the degreaser cover whenever parts are not being handled in the cleaner;
 - (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (e) provide a permanent, conspicuous label summarizing the operating requirements;
 - (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
4. Pursuant to 326 IAC 8-3-3 (Open top vapor degreaser operation), the owner or operator of an open top vapor degreaser shall:
 - (a) equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
 - (b) keep the cover closed at all times except when processing work loads through the degreaser;
 - (c) minimize solvent carry-out by:
 - (1) racking parts to allow complete drainage;
 - (2) moving parts in and out of the degreaser at less than 3.3 meters per

minute (eleven (11) feet per minute);

- (3) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (4) tipping out any pools of solvent on the cleaned parts before removal; and
 - (5) allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
 - (e) not occupy more than half of the degreaser's open top area with the workload;
 - (f) not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
 - (g) never spray above the vapor level;
 - (h) repair solvent leaks immediately, or shut down the degreaser;
 - (i) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
 - (j) not use workplace fans near the degreaser opening;
 - (k) not allow visually detectable water in the solvent exiting the water separator; and
 - (l) provide a permanent, conspicuous label summarizing the operating requirements.

5. Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control),

- (a) the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) the solvent is agitated; or
 - (C) the solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals

(thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

- (1) Close the cover whenever articles are not being handled in the degreaser.
- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

6. Pursuant to 326 IAC 8-3-6 (Open top vapor degreaser operation and control requirements),

- (a) The owner or operator of an open top vapor degreaser shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover that can be opened and closed easily without disturbing the vapor zone.

- (2) Equip the degreaser with the following switches:
 - (A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.
 - (B) A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).
- (3) Equip the degreaser with a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) Equip the degreaser with one (1) of the following control devices:
 - (A) A freeboard ratio of seventy-five hundredths (0.75) or greater and a powered cover if the degreaser opening is greater than one (1) square meter (ten and eight-tenths (10.8) square feet).
 - (B) A refrigerated chiller.
 - (C) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser.
 - (D) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to vapor interface area and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.
 - (E) Other systems of demonstrated equivalent or better control as those outlined in clauses (A) through (D). Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) The owner or operator of an open top vapor degreaser shall ensure that the following operating requirements are met:
 - (1) Keep the cover closed at all times except when processing workloads through the degreaser.
 - (2) Minimize solvent carry-out emissions by:
 - (A) racking articles to allow complete drainage;
 - (B) moving articles in and out of the degreaser at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute);
 - (C) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (D) tipping out any pools of solvent on the cleaned articles before removal; and

- (E) allowing articles to dry within the degreaser for at least fifteen (15) seconds or until visually dry.
- (3) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood, or rope.
- (4) Prohibit occupation of more than one-half ($\frac{1}{2}$) of the degreaser's open top area with the workload.
- (5) Prohibit the loading of the degreaser to the point where the vapor level would drop more than ten (10) centimeters (four (4) inches) when the workload is removed.
- (6) Prohibit solvent spraying above the vapor level.
- (7) Repair solvent leaks immediately or shut down the degreaser if leaks cannot be repaired immediately.
- (8) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.
- (9) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser open area unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration requirements.
- (10) Prohibit the use of workplace fans near the degreaser opening.
- (11) Prohibit visually detectable water in the solvent exiting the water separator.

This registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Management that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Management
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

NLJ

cc: File - Boone County
Boone County Health Department
Air Compliance - Marc Goldman
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3)

Company Name:	Stalcop L.P.
Address:	1217 West Main Street
City:	Thorntown
Authorized individual:	John Strong
Phone #:	(765) 436-3316
Registration #:	011-12192-00047

I hereby certify that Stalcop L.P. is still in operation and is in compliance with the requirements of Registration 011-12192-00047.

Name (typed):
Title:
Signature:
Date:

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name: Stalcop L.P.
Source Location: 1217 West Main Street, Thorntown, IN 46071
County: Boone
SIC Code: 3499
Operation Permit No.: 011-12192-00047
Permit Reviewer: Nysa L. James

The Office of Air Management (OAM) has reviewed an application from Stalcop L.P. relating to the construction and operation of a steel, aluminum and copper cold forming operation.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted facilities/units:

- (a) Thirteen (13) natural gas-fired heaters, with a maximum heat input capacity of 0.120 mmBtu/hr each and exhaust to the atmosphere.
- (b) One (1) natural gas-fired heater, with a maximum heat input capacity of 0.300 mmBtu/hr and exhausts to the atmosphere.
- (c) One (1) natural gas-fired heater, with a maximum heat input capacity of 0.414 mmBtu/hr and exhausts to the atmosphere.
- (d) One (1) open top vapor degreaser, with a maximum solvent usage rate of 4.15 pounds per hour and exhausts to the atmosphere.
- (e) One (1) heat treating process consisting of two (2) electric brazing furnaces and one (1) annealing furnace.
- (f) One (1) cleaning area consisting of the following:
 - 1. One (1) aqueous acid copper cleaning line designated as the "Bright Dip Line", consisting of several dip tanks containing various acid cleaners and rinses;
 - 2. One (1) degreasing line designated as the "De-Scale Line", consisting of several dip tanks containing various acid cleaners and rinses to prevent rust; and
 - 3. One (1) vibratory burnisher designated as the "Dishwasher" which is used to brighten and clean both copper and steel parts.
- (g) One (1) fabrication area consisting of the following:
 - 1. Pressing;
 - 2. Machining;
 - 3. Threading;
 - 4. Grinding;
 - 5. Sanding; and

6. Metal Cutting.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 19, 2000, with additional information received on June 5, 2000, August 4, 2000 and August 9, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations for the welding and combustion processes (Pages 1 and 2 of Appendix A).

In addition, the calculations submitted by the applicant for the vapor degreaser and the other various cleaning lines have been verified and found to be accurate and correct.

VOC PTE -

Vapor degreaser PTE = Maximum solvent usage * % VOC * 8760 hours per year * ton/2000 pounds
= 4.15 pounds per hour * 100% * 8760 hours per year * ton/2000 pounds
= 18.18 tons per year.

De-Scale Line:

EC-514 maximum usage rate * % VOC * 8760 hours per year * ton/2000 pounds = 0.16 gal/hr * 0.09% * 8760 hours per year * ton/2000 pounds = 0.06 tons per year.

Brite Dip Line:

EC-514 maximum usage rate * % VOC * 8760 hours per year * ton/2000 pounds = 0.93 gal/hr * 0.09% * 8760 hours per year * ton/2000 pounds = 3.46 tons per year.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	1.24
PM-10	1.24
SO ₂	0.01
VOC	21.75
CO	0.21
NO _x	1.00

HAP's	Potential To Emit (tons/year)
Chromium	0.001
Manganese	0.032
TOTAL	0.033

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Boone County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Boone County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Boone County has been classified as attainment or unclassifiable for CO, SO₂ and PM₁₀. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	1.24
PM10	1.24
SO ₂	0.01
VOC	21.75
CO	0.21
NO _x	1.0
Chromium	0.001
Manganese	0.032

Combination HAPs	0.033
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- (a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) 40 CFR Part 63, Subpart T (Halogenated Solvent Cleaning) does not apply to the open top vapor degreaser because the solvent used (n-propyl bromide) by the unit is not listed in 40 CFR §63.460.
- (c) No other National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) are applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting) does not apply to the source, since the CO, VOC, SO₂, NO_x and PM₁₀ emissions are less than one-hundred (100) tons per year.

326 IAC 5-1 (Visible Emissions Limitations):

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Cleaner Tank of the Bright Dip Line and Cleaner Tank of the De-Scale Line

326 IAC 2-4.1-1 (New Source Toxics Rule) does not apply to the two (2) cleaner tanks because the potential to emit of a single HAP of each unit is less than 10 tons per year and the combination HAPs of each unit is less than 25 tons per year.

326 IAC 6-3 (Process Operations) does not apply to the two (2) cleaner tanks because the tanks do not emit PM.

326 IAC 8-1-6 (New Facilities; general reduction requirements) does not apply to the two (2) cleaner tanks because the each unit is governed under 326 IAC 8-3-2 and 326 IAC 8-3-5, and the potential to emit of VOC of each unit is less than 25 tons per year.

326 8-3-2 (Cold Cleaner Operation):

Pursuant to 326 8-3-2 (Cold Cleaner Operation), the owner or operator of a cold cleaning facility shall:

- (a) equip the cleaner with a cover;
- (b) equip the cleaner with a facility for draining cleaned parts;
- (c) close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) provide a permanent, conspicuous label summarizing the operating requirements;
- (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control):

Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control),

- (a) the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) the solvent is agitated; or
 - (C) the solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32)

millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

No other 326 IAC 8 rules apply to the two (2) cleaner tanks.

State Rule Applicability - Open Top Vapor Degreaser

326 IAC 2-4.1-1 (New Source Toxics Rule) does not apply to the open top vapor degreaser because the potential to emit of a single HAP of each unit is less than 10 tons per year and the combination HAPs of each unit is less than 25 tons per year.

326 IAC 6-3 (Process Operations) does not apply to the open top vapor degreaser because the facility does not emit PM.

326 IAC 8-1-6 (New Facilities; general reduction requirements) does not apply to the open top vapor degreaser because the unit is governed under 326 IAC 8-3-3 and 326 IAC 8-3-6, and the potential to emit of VOC of the unit is less than 25 tons per year.

326 IAC 8-3-3 (Open top vapor degreaser operation):

Pursuant to 326 IAC 8-3-3 (Open top vapor degreaser operation), the owner or operator of an open top vapor degreaser shall:

- (a) equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) keep the cover closed at all times except when processing work loads through the degreaser;
- (c) minimize solvent carry-out by:
 - (1) racking parts to allow complete drainage;
 - (2) moving parts in and out of the degreaser at less than 3.3 meters per minute

- (eleven (11) feet per minute);
- (3) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
- (4) tipping out any pools of solvent on the cleaned parts before removal; and
- (5) allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) not occupy more than half of the degreaser's open top area with the workload;
- (f) not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) never spray above the vapor level;
- (h) repair solvent leaks immediately, or shut down the degreaser;
- (i) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (j) not use workplace fans near the degreaser opening;
- (k) not allow visually detectable water in the solvent exiting the water separator; and
- (l) provide a permanent, conspicuous label summarizing the operating requirements.

326 IAC 8-3-6 (Open top vapor degreaser operation and control requirements):

Pursuant to 326 IAC 8-3-6 (Open top vapor degreaser operation and control requirements),

- (a) The owner or operator of an open top vapor degreaser shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover that can be opened and closed easily without disturbing the vapor zone.
 - (2) Equip the degreaser with the following switches:
 - (A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.
 - (B) A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).
 - (3) Equip the degreaser with a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) Equip the degreaser with one (1) of the following control devices:
 - (A) A freeboard ratio of seventy-five hundredths (0.75) or greater and a powered cover if the degreaser opening is greater than one (1) square meter (ten and eight-tenths (10.8) square feet).

- (B) A refrigerated chiller.
 - (C) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser.
 - (D) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to vapor interface area and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.
 - (E) Other systems of demonstrated equivalent or better control as those outlined in clauses (A) through (D). Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) The owner or operator of an open top vapor degreaser shall ensure that the following operating requirements are met:
- (1) Keep the cover closed at all times except when processing workloads through the degreaser.
 - (2) Minimize solvent carry-out emissions by:
 - (A) racking articles to allow complete drainage;
 - (B) moving articles in and out of the degreaser at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute);
 - (C) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (D) tipping out any pools of solvent on the cleaned articles before removal; and
 - (E) allowing articles to dry within the degreaser for at least fifteen (15) seconds or until visually dry.
 - (3) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood, or rope.
 - (4) Prohibit occupation of more than one-half ($\frac{1}{2}$) of the degreaser's open top area with the workload.
 - (5) Prohibit the loading of the degreaser to the point where the vapor level would drop more than ten (10) centimeters (four (4) inches) when the workload is removed.
 - (6) Prohibit solvent spraying above the vapor level.
 - (7) Repair solvent leaks immediately or shut down the degreaser if leaks cannot be repaired immediately.
 - (8) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

- (9) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser open area unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration requirements.
- (10) Prohibit the use of workplace fans near the degreaser opening.
- (11) Prohibit visually detectable water in the solvent exiting the water separator.

State Rule Applicability - Fabrication Area (consisting of threading, pressing, machining, sanding, grinding, metal cutting and welding)

326 IAC 6-3-2 (Process Operations):

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. Therefore, the threading, pressing, machining, sanding, metal cutting and welding operations shall not exceed 0.551 pounds per hour per unit, based on a maximum process weight of less than 100 pounds per hour per unit.

Conclusion

The construction and operation of this a steel, aluminum and copper cold forming operation shall be subject to the conditions of the attached proposed **Registration 011-12192-00047**.

Appendix A: Emission Calculations

Natural Gas Combustion Only

MM Btu/hr 0.3 - < 10

Fifteen (15) natural gas-fired space heaters

Company Name: Stalcorp, L.P.

Address City IN Zip: 1217 West Main Street, Thorntwon, IN 46071

CP: 011-12192

Plt ID: 011-00047

Reviewer: NLJ

Date: 06/06/2000

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.3

19.9

Pollutant

Emission Factor in lb/MMCF	PM 11.9	PM10 11.9	SO2 0.6	NOx 100.0	VOC 5.3	CO 21.0
Potential Emission in tons/yr	0.12	0.12	0.01	1.00	0.05	0.21

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton